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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

In Re:	§	
Tommie Neil Lundy	§	Case No. 14-70222-hdh-13
Gerald Ann Lundy	§	Chapter 13
Debtors	§	

DEBTORS' MOTION TO EXTEND AUTOMATIC STAY

Comes Now Debtors, by counsel, and for this Motion state as follows:

1. Debtors filed for relief under Chapter 13 in the Northern District of Texas. This is a core proceeding.
2. Debtors were debtors in a prior case during the preceding year. Debtors filed Chapter 13, Case No. 11-70206-HDH-13 on May 26, 2011.
3. Debtors seek an extension of the automatic stay imposed for 30-days pursuant to 11 U.S.C. §362(c)(3)(A), as to all creditors until further order or discharge to effectuate an orderly reorganization, pursuant to 11 U.S.C. §362(c)(3)(B).
4. Debtors' prior case was dismissed for: Failure to make payments. Debtors had many medical problems, surgeries and additional prescription costs which caused them to fall behind with their \$720.00 Trustee payments and they were unable to bring the payments current.
5. The following changes of circumstances demonstrate that the Debtors can perform this plan and are likely to complete the case successfully: Debtors' new payment decreased to \$520.00. Debtors' are re-filing to save their home. Debtors understand that this may be the last opportunity to file a bankruptcy case.

WHEREFORE, Debtors request this Court enter its order continuing the automatic stay under §362(a) in this proceeding as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2) or a motion for relief is granted under §362(d).

Respectfully submitted,

/s/Monte J. White, Attorney for Debtors

CERTIFICATE OF CONFERENCE

On July 11, 2014, the Office of Monte J. White & Associates, P.C. contacted Marc McBeath, Counsel for the Chapter 13 Trustee, and was advised that the Trustee does not oppose the Motion.

/s/Monte J. White, Attorney for Debtors

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on July 24, 2014 on all parties on the mailing matrix:

/s/Monte J. White, Attorney for Debtors

Account Rec Special/Sumner Regi 200 W. Wyatt Earp Dodge City, KS 67801	Citibank Usa/The Home Depot CITICORP CREDIT SERVICES/ATTN: PO Box 20507 Kansas City, MO 64195	Meritrust Credit Union 8710 E 32nd St N Wichita, KS 67226
Allen L. Adkins & Associ, PC PO Box 3340 Lubbock, TX 79452	Cpu/citi - Conoco Phillips Unio Attn: Centralized Bankruptcy PO Box 20363 Kansas City, MO 64195	Panhandle Federal Credit Union 403 N Washington Wellington, KS 67152
Ally Financial P O Box 380901 Bloomington, MN 55438	Farmers National Bank/Newcastle PO Box 10 Newcastle, TX 76372	Provident Funding Asso 1235 N. Dutton Ave Santa Rosa, CA 95401
BAC Home Loans Service 450 American St Simi Valley, CA 93065	GEMB/JC Penney Attention: Bankruptcy PO Box 103104 Roswell, GA 30076	Star Tex Power PO Box 4802 Houston, TX 77210-4802
Berlin Wheeler Inc/Kansas Gas S Pob 479 Topeka, KS 66601	Gerald Ann Lundy 1116 W Howard Olney, TX 76374	Sumner County Treasurer's Offic 501 N Washington Wellington, KS 67152
Capital One, N.a. Bankruptcy Dept PO Box 5155 Norcross, GA 30091	HSBC Bank Po Box 5253 Carol Stream, IL 60197	Tommie Neil Lundy 1116 W Howard Olney, TX 76374
CCS/Progressive Insurance PO Box 709 Needham Heights, MA 02494	Internal Revenue Service Special Procedures-Insolvency PO Box 7346 Philadelphia, PA 19101	Young Co, Olney ISD, Olney-Hami Perdue Brandon Fielder Collins PO Box 8188 Wichita Falls, TX 76307-8188
Central State Recovery/Wichita PO Box 3130 Hutchinson, KS 67501	IRS Special Procedures 1100 Commerce St., Room 951 Mail Stop 5029 DAL Dallas, TX 75246	
Cer Sts Recovery/Walnut Valley 1314 N Main St Hutchinson, KS 67501	Kansas Dept of Revenue 915 SW Harrison Street Topeka, KS 66625-2000	
Citibank Sd, Na Attn: Centralized Bankruptcy PO Box 20507 Kansas City, MO 64195	Martin, Leigh, Laws &Fritzlen,P 1044 Main Street, Ste 900 Kansas City, MO 64105	